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14
15 **UNITED STATES DISTRICT COURT**

16 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

17 ALEX VILLANUEVA,
18 Plaintiff,

19 v.

20 COUNTY OF LOS ANGELES,
COUNTY OF LOS ANGELES
21 SHERIFF'S DEPARTMENT, LOS
ANGELES COUNTY BOARD OF
22 SUPERVISORS, COUNTY EQUITY
OVERSIGHT PANEL, LOS
ANGELES COUNTY OFFICE OF
23 INSPECTOR GENERAL,
CONSTANCE KOMOROSKI,
24 MERCEDES CRUZ, ROBERTA
YANG, LAURA LECRIVAIN,
25 SERGIO V. ESCOBEDO, RON
KOPPERUD, ROBERT G. LUNA,
26 MAX-GUSTAF HUNTSMAN,
ESTHER LIM, and DOES 1 to 100,
27 inclusive,

28 Defendants.

CASE NO. 2:24-cv-04979 SVW (JCx)

**JOINT STIPULATION RE:
PARTIES' MOTIONS *IN LIMINE***

*[Filed Concurrently with [Proposed]
Order]*

Assigned to the Hon. Stephen V.
Wilson, Crtrm. 10A and Magistrate
Judge Jacqueline Chooljian, Crtrm. 750

Trial Date: June 3, 2025

1 Plaintiff and Defendants (together, the “Parties”), hereby stipulate as follows:

2 **WHEREAS**, on December 11, 2024, the Court set the Final Pretrial
3 Conference in this matter for May 19, 2025 at 3:00 p.m. (Dkt No. 62);

4 **WHEREAS**, on December 11, 2024, the Court set trial in this matter for June
5 3, 2025 commencing at 9:00 a.m. (*id.*);

6 **WHEREAS**, on February 5, 2025, the Parties submitted their Joint Rule 26(f)
7 Report and Proposed Discovery Plan (the “Joint Report”) (Dkt No. 64);

8 **WHEREAS**, the Joint Report required that motions *in limine* be filed by no
9 later than April 28, 2025 (*id.*);

10 **WHEREAS**, the Joint Report mistakenly and erroneously stated that the
11 Parties’ motions *in limine* be set for hearing on May 26, 2025, which is a Court
12 holiday (Memorial Day) (*id.*);

13 **WHEREAS**, the Parties filed their respective motions *in limine* on April 28,
14 2025 and erroneously set them for hearing on May 26, 2025;

15 **WHEREAS**, the Parties mistakenly believed the Joint Report had been
16 entered as the Court’s schedule for this case; and

17 **WHEREAS**, the Parties apologize to the Court and its staff for their mistake
18 and for setting the hearing on the motions *in limine* for a Court holiday, and
19 acknowledge it is an error that the Parties should have avoided.

20 In light of the above, the Parties hereby stipulate to having the motions *in*
21 *limine* heard at the Final Pre-Trial Conference on May 19, 2025 at 3:00 p.m.

22 The motions *in limine* are as follows:

- 23 (1) Plaintiff’s Motion *In Limine* No. 1 To Exclude Testimony and/or
24 Evidence of Plaintiff’s Pension Benefits (Dkt Nos. 94, 113, 120).
25 (2) Plaintiff’s Motion *In Limine* No. 2 To Exclude Evidence or Reference
26 to Alleged Misconduct of Third Party (Dkt Nos. 95, 114, 121).
27 (3) Plaintiff’s Motion *In Limine* No. 3 To Exclude Nick Wilson’s Political
28 Opinions (Dkt Nos. 96, 115, 122).

- 1 (4) Plaintiff's Motion *In Limine* No. 4 To Exclude Evidence, Innuendo, or
2 Argument Referencing "Deputy Gangs" (Dkt Nos. 97, 116, 123).
3 (5) Plaintiff's Motion *In Limine* No. 5 To Exclude Expert Report, Opinion,
4 and Testimony of Marc Cohen (Dkt Nos. 98, 117, 124).
5 (6) Plaintiff's Motion *In Limine* No. 6 To Exclude Expert Report, Opinion,
6 and Testimony of Vida Thomas (Dkt Nos. 99, 118, 125).
7 (7) Defendants' Motion *In Limine* No. 1 To Exclude Multiple Expert
8 Witnesses Re: Emotional Distress (Dkt Nos. 100, 107, 126).
9 (8) Defendants' Motion *In Limine* No. 2 To Exclude Plaintiff's Damages
10 Expert Sandra White (Dkt Nos. 101, 108, 127).
11 (9) Defendants' Motion *In Limine* No. 3 To Exclude Hearsay Statements
12 (Dkt Nos. 102, 109, 128).
13 (10) Defendants' Motion *In Limine* No. 4 To Exclude Vivian Villanueva
14 From Testifying At Trial (Dkt Nos. 103, 110, 129).
15 (11) Defendants' Motion *In Limine* No. 5 To Exclude Evidence Related To
16 POST (Dkt Nos. 104, 111).
17

18 **IT IS SO STIPULATED.**
19

20 DATED: May 13, 2025

SHEGERIAN & ASSOCIATES, INC.

21
22
23 By: /s/ Alex DiBona

ALEX DiBONA

Attorneys for Plaintiff,

ALEX VILLANUEVA
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27
28

1 DATED: May 13, 2025

MILLER BARONDESS, LLP

2
3 By:



4 JASON H. TOKORO

Attorneys for Defendants

MILLER BARONDESS, LLP

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SIGNATURE ATTESTATION

The other signatories listed, and on those behalf the filing is submitted,
concur in the filing's content and have authorized the filing.

DATED: May 13, 2025

MILLER BARONDESS, LLP

By:



JASON H. TOKORO

Attorneys for Defendants

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